

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

S.W., by her parent and natural guardian, J.W., individually and on behalf of all others similarly situated; A.W., by her parent and natural guardian A.W., individually and on behalf of all others similarly situated; J.F. and P. F., by their parent and natural guardian, A.F., individually and on behalf of all others similarly situated; L.T., by her parent and natural guardian, R.T., individually and on behalf of all others similarly situated,

Civ.Action No. 07-cv-5708
(WCC)

AFFIDAVIT

Plaintiffs,

vs.

SHEILA WARREN, sued individually, and as
Director of Early Intervention Services for Orange County,
ORANGE COUNTY DEPARTMENT OF HEALTH,
COUNTY OF ORANGE,

Defendants.

STATE OF NEW YORK)
) ss:
COUNTY OF ORANGE)

Susanna Hatenboer, of full age, under penalties of perjury, respectfully says:

1. I am a certified speech-language pathologist, having been certified by the American Speech and Hearing Association since 1987, and licensed in the State of New York since 1997.
2. In or about 1999 until approximately 2003, I worked for Orange County Early Intervention program and preschool services. I worked under contract with the County, providing speech therapy to children with various disabilities.

3. In or about late 2002, I attended a meeting where Sheila Warren stated that any therapist who did not carry 5 children in his or her caseload could no longer be employed by the County. I was very upset that I would not be able to work with my clients any longer.

4. Because of my full time position in a local school district, I felt I could not commit to providing that level of services. Each case would require a minimum of 2 sessions per week, and could require as many as 5 sessions a week. At that time, I was handling up to 4 clients at any given time, and was willing to continue doing so. However, because of Ms. Warren's stated policy, I was no longer able to do so.

5. In or about April 2007, I contacted the Early Intervention office in Goshen, New York, and inquired whether Ms. Warren's policy regarding maintaining a minimum case load was still in effect. I was told that it was, and that I could no longer be employed by the County again under any circumstances.

6. Should Orange County Early Intervention program change its policy of requiring therapists to maintain a minimum caseload of five, I am willing to again contract with the County to provide speech therapy to children in Orange County to the extent I am able.

Susanna Hatенбоер
Susanna Hatенбоер

Sworn to before me this 16th
day of August, 2007.

Mary J. Whateley
MARY J. WHATELEY
Notary Public, State of New York
No. 4918265 *water*
Qualified in Orange County
Commission Expires 11-31-19 9/14/2011